

**UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CHRISTINA MENZEL  
Plaintiff

V.  
THE PARTNERSHIPS and  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE "A",  
Defendants.

Case No: 22-cv-01365  
Judge: Ronald A. Guzman,

**Pro Se Filing**

**FILED**  
**4/6/2022**

~~THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT~~

**DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION FOR ENTRY OF A PRELIMINARY INJUNCTION**

Defendant Lin Hou Wen represents the store Japceit (5-10Days Delivery) to respectfully submits this Response in Opposition to Plaintiff's Motion for Entry of A Preliminary Injunction, because Plaintiff failed to satisfy the elements of entry of preliminary. Defendant declares under penalty of perjury under the laws of the United States of America that the following statements are true and correct.

According to the evidence provided by the Plaintiff(**Exhibit 1**), it appears the ASINs of the alleged products are B09NQ9LQ6Z, B09QG4QWKC, B09NQ9XYMB, B09NQ9W7MW, and B09NQ9VVTK, Defendant searched the sales volume of each kind of alleged product related to its ASIN and found that the store did not actually sell the accused product to United States (**Exhibit 2**). Details are as follows:

Alleged product's ASIN	Sales volume	Sales funds
B09NQ9LQ6Z	0	0
B09QG4QWKC	0	0
B09NQ9XYMB	0	0
B09NQ9W7MW	0	0
B09NQ9VVTK	0	0

Defendant was not aware of whether the alleged product is copyrighted before being sued, Defendant offered to sell the accused products for a very short time, and while knowing the lawsuit, defendant immediately stopped offering such product. Defendant did not get any profits from alleged products.

However, Defendant's current restrained funds are more than \$35,000, all of which are not related to alleged products. This restriction has caused severe impediments on Defendant, which remains prohibited from

withdrawing any funds from the restrained accounts.

The restrained account includes money from sales of goods for the entire store, and as such, cannot be used to pay for Defendant's suppliers and daily living expense as needed. If the preliminary injunction order is granted, Defendant will face the dilemma of being unable to operate the store for months, it also will result in a great negative impact on the defendant's life.

Based on above, Defendant respectfully requests the court to deny Plaintiff's Motion for Preliminary Injunction Order.

Dated: April 6,2022

Respectfully Submitted

/s/Lin Hou Wen

Operator of Store Japceit (5-10Days Delivery)

136-3274-4754

Building 7, Jingqiao garden, Longhua District,

Shenzhen,China

houwenlin1992@126.com; liangrongmao@126.com

**EXHIBIT 1**

1/19/22, 10:25 PM Case: 1:22-cv-01365 Document # 33 Filed 04/06/22 Page 3 of 7 Page ID # 829

**Amazon Fashion** Women Men Kids Luggage Sales & Deals New Arrivals Our Brands **prime try before you buy**

5,213 Clothing, Shoes & Jewelry > Women > Clothing > Tops, Tees & Blouses > Blouses & Button-Down Shirts

**Brand: Japceit**  
Loose Short Sleeve for Women Funny Skeleton Hand Stroking a Cat Print Pullover Tops for Cat Lover Casual Comfy Blouse

**\$12.98**  
& FREE Returns

Color: White a

Size: Small

Small	Medium	Large	X-Large	XX-Large
\$12.98	\$12.98	\$12.98	\$12.98	\$12.98

- 100% Polyester
- Imported
- Attention: Dear Queen, please check our size chart to choose the right size, we suggest buy one size larger. Do not use the size guide.
- Elastic closure
- Machine Wash
- Women's Western Aztec Blouse Casual Loose Fit Print Long Sleeve Crewneck Shirts Fall Casual Tops
- Womens Long Sleeve Turtleneck Tops Soft Stretchy Fitted Base Layer Shirt Women Collar Neck Long Sleeve Oversized Flannel Plaid Shirts Casual Blouse Tops with Pockets Women Color Block Waffle Knit Henley Shirts Long Sleeve V-Neck Slim Fit Thermal Button Up Tunics Tops Plus Size T-Shirt Tigger Classic Graphic Tee Sunflower Printed Graphic Long Sleeve Shirts Casual Novelty T-Shirt Tee Tops Blouse
- graphic t-shirt dresses for women sexy graphic t-shirt dresses plus size graphic t-shirt women vintage graphic t-shirt girls graphic t-shirt 90s vintage streetwear graphic t-shirt for teen girls Vintage Oversized T Shirts Teen Girls Casual Short Sleeve Cute Graphic Tees Shirts Blouses Top Women's Teen Girls Short Sleeve Graphic Tshirt Cute Leopard Sunflower Colorful Butterflies Pineapple Cat Print Tops Graphic Pattern Print Tank Tops Casual Sleeveless Summer Tops Holiday Tee Shirt

Show more

**\$12.98**  
**In stock.**  
Usually ships within 2 to 3 days.  
Qty: 1 Add to Cart Buy Now Secure transaction  
Ships from Japceit (5-10Days Deli... Sold by Japceit (5-10Days Deli... Details  
Return policy: Eligible for Return, Refund or Replacement.  
Add to List

Share

**Products related to this item**

Sponsored

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**Have a question?**  
Find answers in product info, Q&As, reviews

Type your question or keyword

**Product Description**

Welcome To Japceit Store

Wish you a pleasant shopping experience in here  
Japceit Commit to providing high-quality clothing for women  
Whether it is before or after the purchase, if you have any questions, please feel free to contact us, we will solve it for you as soon as possible.  
Please attention the size :we are Asian size,run smaller than US size,so i will suggest you choose one size or two size larger than your usual size , it will be more relaxed and comfy.Or take a look at our last picture above to select the size that suits you best.  
If the size is not suitable, please feel free to contact us. We can replace the size for free. Thanks

**Product details**

Item model number : NEW SALE  
Department : Womens  
Date First Available : December 16, 2021  
Manufacturer : Japceit  
ASIN : B09NQ9LQ6Z

How confident are you in finding a size that will fit you well?  
Not at all Somewhat Fairly Very Extremely

Submit

Amazon.com | cat skeleton

Deliver to Chicago 60603 Japceit (5-10Days Delivery) cat skeleton

All Amazon.com Best Sellers Pet Supplies Toys & Games Customer Service Amazon Home Buy Again Shopper Toolkit Health & Household Amazon Live Beauty & Personal Care Gift Cards Coupons Amazon Launchpad Find a Gift

Sort by: Featured

1-16 of 85 results for "cat skeleton"

**Brand**  
Japceit

Price and other details may vary based on product size and color.

 **Women's Retro Y2k Crop Tops Skeleton Man Holding a Cat Graphic Tees Summer Sexy Crew Neck Tunic T-Shirt for Cat Lover**  
\$10<sup>99</sup>  
\$2.99 shipping  
Rank not found  
ASIN: B09QG4QWKC  
[Price History](#) [Keepa History](#)

 **Cat Lover Shirt Womens Vintage Short Sleeve T Shirt Skeleton Holding His Cat Funny Print Loose Crewneck Pullover Tops**  
\$12<sup>98</sup>  
FREE Shipping  
Rank not found  
ASIN: B09NQ9XYMB  
[Price History](#) [Keepa History](#)

 **Women's Vintage Short Sleeve T Shirt Cat Lover Shirt Skeleton Holding His Cat Funny Print Loose Crewneck Pullover Tee**  
\$12<sup>98</sup>  
FREE Shipping  
Rank not found  
ASIN: B09NCQ9W7MW  
[Price History](#) [Keepa History](#)

 **Loose Short Sleeve for Women Funny Skeleton Hand Stroking a Cat Print Pullover Tops for Cat Lover Casual Comfy Blouse**  
\$12<sup>98</sup>  
FREE Shipping  
Rank not found  
ASIN: B09NQ9VVTK  
[Price History](#) [Keepa History](#)

 **Skeleton Diamonds Fall Womens Tops Dressy Casual Long Sleeve Leopard Print Splicing T Shirt V Neck Loose Pullover Comfy Shirt**  
\$18<sup>98</sup>  
FREE Shipping  
Rank not found  
ASIN: B09PDFWWP9  
[Price History](#) [Keepa History](#)

 **Cat Print Shirt for Women Dreamy Star Moon Cat Graphic Tops Casual Long Sleeve Crewneck Pullover Elastic Comfy Blouse**  
\$6<sup>99</sup>  
\$5.99 shipping  
Rank not found  
ASIN: B09NVSLJSS  
[Price History](#) [Keepa History](#)

 **Cat Lovers Gifts for Women Different Cute Cat Paw Graphic Blouse Cat Mama Casual Long Sleeve Tops Loose Comfy Tee Shirt**  
\$20<sup>99</sup>  
\$4.99 shipping  
Rank not found  
ASIN: B09Q3FN1GM  
[Price History](#) [Keepa History](#)

 **Cat Lovers Tees for Women Cute Funny Kitten and Mom Graphic for Pet Owner Short Sleeve Casual Summer T-Shirt**  
\$9<sup>99</sup>  
\$2.99 shipping  
Rank not found  
ASIN: B09P3YD6ZJ  
[Price History](#) [Keepa History](#)

 **Womens Fall Tops Rhinestone Skull Long Sleeve T-Shirt Loose V-Neck Loose Fit Tunics Casual Skeleton Shiny Bling Blouse**  
\$17<sup>98</sup>  
FREE Shipping  
Loading rank...   
ASIN: B09PDGWR2K  
[Price History](#) [Keepa History](#)

 **Oversize Shirt for Women Funny Skull and Cute Cat Printing Tops Summer Casual Short Sleeve T-Shirt Loose Comfy Basic Tee**  
\$6<sup>99</sup>



## Choose your shipping options

**Shipment 1 of 1****Shipping from Japceit (5-10Days Delivery)** ([Learn more](#))

Shipping to [REDACTED] 111 W JACKSON BLVD STE 1700, CHICAGO, IL, 60604-3597 United States

- **Loose Short Sleeve for Women Funny Skeleton Hand Stroking a Cat Print Pullover Tops for Cat Lover Casual Comfy Blouse**

\$12.98 - Quantity: 1

Sold by: Japceit (5-10Days Delivery)

[Change quantities or delete](#)**Choose a delivery option:** **Wednesday, Feb. 2 - Monday, Feb. 14**

FREE Shipping

Do you have a gift card or promotional code? We'll ask you to enter your claim code when it's time to pay.

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amazon.com Place Your Order | Amazon.com Selection

SIGN IN SHIPPING & PAYMENT GIFT OPTIONS PLACE ORDER

**Review your order**

**Shipping address** Change  
[REDACTED]  
 111 W JACKSON BLVD STE 1700  
 CHICAGO, IL 60604-3597  
 United States  
 Phone: [REDACTED]  
[Add delivery instructions](#)

**Payment method** Change [REDACTED] \$14.31 gift card balance

**Add a gift card, promotion code, or voucher**

**Place your order**

By placing your order, you agree to Amazon's [privacy notice](#) and [conditions of use](#).

**Order Summary**

Items:	\$12.98
Shipping & handling:	\$0.00
Total before tax:	\$12.98
Estimated tax to be collected: <sup>*</sup>	\$1.33
Total:	\$14.31
Gift Card:	-\$14.31
<b>Order total:</b>	<b>\$0.00</b>

[How are shipping costs calculated?](#)

**Estimated delivery:** Feb. 2, 2022 - Feb. 14, 2022

 **Get a \$50 Amazon Gift Card instantly** upon approval for the Amazon Rewards Visa Card. [Learn more](#)

**Choose a delivery option:**  
 **Wednesday, Feb. 2 - Monday, Feb. 14**  
 FREE Shipping

Loose Short Sleeve for Women Funny Skeleton Hand Stroking a Cat Print Pullover Tops for Cat Lover Casual Comfy Blouse **\$12.98 & FREE Returns** [▼](#)  
**Quantity:** 1 [Change](#)  
 Sold by: Japeit (5-10Days Delivery)  
 **Gift options not available.**

\*Why has sales tax been applied? [See tax and seller information](#)

Do you need help? Explore our [Help pages](#) or [contact us](#)

For an item sold by Amazon.com: When you click the "Place your order" button, we'll send you an email message acknowledging receipt of your order. Your contract to purchase an item will not be complete until we send you an email notifying you that the item has been shipped.

Colorado, Louisiana and Puerto Rico Purchasers: [Important information regarding sales tax you may owe in your State](#)

Within 30 days of delivery, you may return new, unopened merchandise in its original condition. Exceptions and restrictions apply. See Amazon.com's [Returns Policy](#)

Go to the [Amazon.com homepage](#) without completing your order.

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## EXHIBIT 2

ASIN:B09QG4QWKC

Manage Orders [Learn more](#) [Video tutorials](#)

[Go back to order list](#) **0 orders** Last 365 days

No orders were found that match the given search criteria.

ASIN:B09NQ9VVTK

Manage Orders [Learn more](#) [Video tutorials](#)

[Go back to order list](#) **0 orders** Last 365 days

No orders were found that match the given search criteria.

ASIN:B09NQ9W7MW

Manage Orders [Learn more](#) [Video tutorials](#)

[Go back to order list](#) **0 orders** Last 365 days

No orders were found that match the given search criteria.

ASIN:B09NQ9LQ6Z

Manage Orders [Learn more](#) [Video tutorials](#)

[Go back to order list](#) **0 orders** Last 365 days

No orders were found that match the given search criteria.

ASIN:B09NQ9XYMB

Manage Orders [Learn more](#) [Video tutorials](#)

[Go back to order list](#) **0 orders** Last 365 days

No orders were found that match the given search criteria.